

0002/01/0

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL DIVISION

DISCOVER BANK

Plaintiff

vs.

RAMIRA CLAUD GORDON

Defendant

No: 09-29234

COMPLAINT IN CIVIL ACTION

FILED ON BEHALF OF
Plaintiff

COUNSEL OF RECORD OF
THIS PARTY:

Michael J. Dougherty, 76046
WELTMAN, WEINBERG & REIS CO., L.P.A.
325 CHESTNUT STREET SUITE 501
PHILADELPHIA, PA 19106-2614
215-599-1500
FAX: 215-599-1505
07648716 C A Jer JHR

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0002/01/01

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA
CIVIL DIVISION

DISCOVER BANK

Plaintiff

vs.

Civil Action No

09-29234

RAMIRA CLAUD GORDON

Defendant

COMPLAINT AND NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERENCE SERVICE
MONTGOMERY COUNTY BAR ASSOCIATION
100 WEST AIRY STREET (REAR)
NORRISTOWN, PA 19404-0268
(610) 279-9660, EXT 201



2009-29234-0000
9/15/2009 4:33:03 PM
Complaint Civil Action
Receipt# 2009-13-01634
Mark Levy - Montgomery County Prothonotary

239.50

AZ

0002/01/0

COMPLAINT

1. Plaintiff, DISCOVER BANK is a corporation with offices at 6500 NEW ALBANY ROAD NEW ALBANY , OH 43054 .

2. Defendant is adult individual(s) residing at the address listed below:

RAMIRA CLAUD GORDON
7 JOHNS RD
CHELTENHAM, PA 19012

3. Defendant applied for and received a credit card bearing the account number XXXXXXXXXXXX3481 .

4. Defendant made use of said credit card and has a current balance due of \$1705.63 , as of July 09, 2009 .

5. Defendant is in default by failing to make monthly payments when due. As such, the entire balance is immediately due and payable to Plaintiff.

6. Plaintiff is entitled to the addition of interest at the rate of 29.990% per annum on the unpaid balance from July 09, 2009 . A copy of Plaintiff's STATEMENT is attached hereto, marked as Exhibit "1" and made a part hereof.

Az

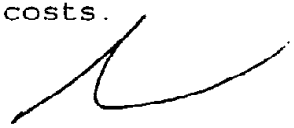
0002/03/0

7. Plaintiff avers that the Agreement between the parties provides that Defendant will pay Plaintiff's attorneys' fees.

8. Plaintiff avers that such attorneys' fees will amount to \$125.00 .

9. Although repeatedly requested to do so by Plaintiff, Defendant has willfully failed and/or refused to pay the balance due to Plaintiff.

Wherefore, the Plaintiff prays for Judgment in its favor and against Defendant , RAMIRA CLAUD GORDON , INDIVIDUALLY , in the amount of \$1705.63 with interest at the rate of 29.990% per annum from July 09, 2009 plus attorneys' fees of \$125.00 , and costs.



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This law firm is a debt collector attempting to collect this debt for our client and any information obtained will be used for that purpose.

○ ○ ○ ○ ○

EXHIBIT
A



New Balance
\$1,705.63

Minimum Payment Due
\$310.00

Account Number ending in 3481
Enter Amount Enclosed Below

Payment Due Date
July 23, 2009

\$

24 SDSN8A01 0004459

RAHIRA GORDON
7 JOHNS RD
CHELTENHAM PA 19012-1808

Will your payment get to us on time? Pay your bill online and your payment can be made to your account on the same day. Visit Discover.com/payments today.

PO BOX 71084
CHARLOTTE NC 28272-1084

Address, e-mail or telephone changes? Print change in space above, or go to Discover.com. Print your e-mail address to receive important Account Information and special offers.

000001986458293487498017056300000000031000

Discover More Card Account Summary

Closing Date: June 24, 2009 page 1 of 1

Account number ending in	3481	Previous Balance	\$1,705.63
Payment Due Date	July 23, 2009	Payments And Credits	0.00
Minimum Payment Due	\$310.00	Purchases	0.00
Credit Limit	\$1,000.00	Cash Advances	0.00
Credit Available	\$0.00	Balance Transfers	0.00
Cash Credit Limit	\$500.00	Finance Charges	0.00
Cash Credit Available	\$0.00	New Balance	\$1,705.63

Cashback Bonus*

Opening Cashback Bonus Balance	\$	0.00
New Cashback Bonus This Period	+	<u>0.00</u>
Cashback Bonus Balance	\$	0.00

Cashback Bonus Anniversary
Date: November 24

How Can We Help You?

It's your choice - 3 ways to help

Please have your Discover Card available.

For TDD (assistance for hearing impaired) see reverse side

1. Visit Discover.com to pay your bill for no cost, view your latest Account information, earn and redeem rewards and more
2. Call 1-800-DISCOVER (347-2683) for fast, easy self-service options or to speak with a Customer Service Account Manager
3. Write us at Discover Card, PO Box 30943, Salt Lake City, UT 84130

Finance Charge Summary


	Average Daily Balances	Daily Periodic Rates	Nominal ANNUAL PERCENTAGE RATES	ANNUAL PERCENTAGE RATES	Periodic FINANCE CHARGES	Transaction Fee FINANCE CHARGES
current billing period: 31 days						
Purchases	\$0	0.08216%	29.99% F	29.99%	\$0	\$0
Paid Purchases	\$0	0.08216%	29.99% F	29.99%	\$0	\$0
Cash Advances	\$0	0.08216%	29.99% F	29.99%	\$0	\$0

The rates that apply to your Account are either fixed (F) or they may vary (V) as noted above.

660276776

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsifications to authorities, that she is Nicole Rose
(Name)
Accounts Manager of DFS Services LLC, plaintiff herein, that
(Title) (Company)
she is duly authorized to make this Verification, and that the facts set forth in the foregoing Complaint in Civil Action are true and correct to the best of her knowledge, information and belief.


(Signature)

WWR# 7648716
Ramira C. Gordon
'6011002150343481